

EXHIBIT D

Sieg, K. Elizabeth

From: Burge, Jason W. <jburge@fishmanhaygood.com>
Sent: Friday, November 03, 2017 3:47 PM
To: Farrell, Thomas M.; Sieg, K. Elizabeth
Cc: Lynn Swanson; Austin Smith (aconnellsmith@gmail.com); Joshua Kons (joshuakons@konslaw.com); Tad Bartlett; Johnson, Kaki
Subject: Proposal on Motion to Compel

Tom and Beth,

Following up on my call with Tom, we are prepared to pass on a hearing for the motion to compel if:

1. Navient produces all documents responsive to RFP 10 (including all policies relating to collections) by Friday, November 10, and certify that they have completed production responsive to our May RFPs by that day.
2. Although we believe these documents were contemplated by the prior requests, Navient agrees to respond to the following RFP by November 10:
RFP 10(A). Please produce all documents relating to the creation or confection of any compliance manuals, training materials, or other internal documentation produced in response to RFP 10, as well as any internal analyses justifying or providing a business rationale for these materials.
3. Navient agrees to our most recent scheduling proposal, contained in my letter of November 1, 2017, and agrees to have a status conference with the Court in connection with its submission.
4. Navient agrees that within 30 days of their production of the policies relating to collections, Plaintiffs can submit a proposed expert on collections.

Please indicate if these conditions are acceptable.

Cordially,

Jason

Jason W. Burge

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